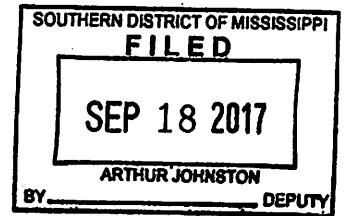


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A TROUT  
POINT LODGE LTD OF NOVA SCOTIA  
& IN THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, TORSTAR  
CORPORATION, NATIONAL  
GEOGRAPHIC SOCIETY, XYZ  
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

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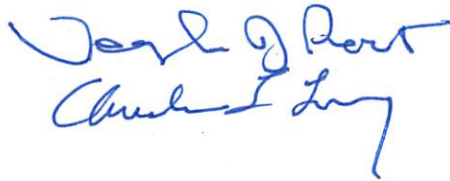
**DEFENDANTS VAUGHN PERRET AND CHARLES LEARY'S  
PRO SE MOTION TO QUASH SERVICE OF PROCESS  
AND NOTATION OF DEFAULT**

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COME NOW Defendants Vaughn Perret and Charles Leary, appearing *pro se*, and file this their Motion to Quash Service of Process and Notation of Default, and would show that the Plaintiff has not followed this Court's Order regarding service on Trout Point Lodge, Limited, and has made service using alternative means denied by this Court in Its Order, and for the reasons discussed in their memorandum brief in support of this motion, which is filed contemporaneously herewith. Plaintiff has not properly served Trout Point Lodge, Limited, either in accordance with the Order or with the Convention on Service Abroad of Judicial and Extrajudicial Documents in Civil and Commercial Matters, Nov. 15, 1965 (Hague Convention), [1969] 20 U.S.T. 361, and the notation of default taken by the Clerk upon Plaintiff's motion should be nullified.

Defendants Leary and Perret respectfully move this Court to find quash the purported service on Trout Point Lodge and for such general relief as the Court deems appropriate in the premises.

RESPECTFULLY SUBMITTED, this the 14<sup>th</sup> day of September, 2017.



VAUGHN PERRET, DEFENDANT and  
CHARLES LEARY, DEFENDANT

appearing *pro se*

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